

EXHIBIT B



"Alan Rich"
<arich@baronbudd.com>
02/16/2007 02:50 PM

To "Amanda Basta" <ABasta@kirkland.com>
cc "Barbara Harding" <bharding@kirkland.com>, <eahern@kirkland.com>
bcc
Subject RE: W.R. Grace-- Celotex Subpoena

That's fine. I will wait to hear on Celotex, since Monday is the objection deadline. However -- as for the Eagle Pitcher subpoena in Chicago, that subpoena calls for document production on Monday. Putting aside whatever the reason was I received notice of that subpoena just yesterday, is that going forward?

-----Original Message-----

From: Amanda Basta [mailto:ABasta@kirkland.com]
Sent: Friday, February 16, 2007 1:33 PM
To: Alan Rich
Cc: Barbara Harding; eahern@kirkland.com
Subject: RE: W.R. Grace-- Celotex Subpoena

Alan--

We were able to discuss limiting the scope of Request #1 with CRMC today. It is our understanding that it will not pose an undue burden on them and so we agree to limit the request to Grace claimants. Accordingly, it is our understanding that Baron & Budd will not move to quash the CRMC subpoena. We have also attempted to reach the appropriate person at Celotex Trust, but have been unable to speak with him. We will continue to follow up, and hope that we can make similar arrangements with Celotex. Please let us know if you have any questions.

Regards,

Amanda

Amanda Basta
Kirkland & Ellis LLP
655 15 th Street NW
Washington DC 20005
(202) 879-5933
(202) 879-5200 (fax)
(Admitted only in Massachusetts and practice is supervised by principals of the Firm)

"Alan Rich"
<arich@baronbudd.com>
02/14/2007 12:12 PM

To "Barbara Harding" <bharding@kirkland.com>
<ABasta@kirkland.com>, <eahern@kirkland.com>, <jbaer@kirkland.com>, <JMarvin@claimsres.com>, <lesayian@kirkland.com>, <ndf@capdale.com>
cc
Subj RE: W.R. Grace-- Celotex Subpoena
ect

That is correct.

-----Original Message-----

From: Barbara Harding [mailto:bharding@kirkland.com]
Sent: Wednesday, February 14, 2007 11:12 AM
To: Alan Rich
Cc: ABasta@kirkland.com; eahern@kirkland.com; jbaer@kirkland.com; JMarvin@claimsres.com; lesayian@kirkland.com; ndf@capdale.com
Subject: Re: W.R. Grace-- Celotex Subpoena

Alan, If we agree to limit the subpoenas in the fashion requested does that mean that you will not be filing an objection to either subpoena? Thanks. Barbara

Barbara Harding | Partner | KIRKLAND & ELLIS LLP |
655 Fifteenth Street, NW, Suite 1200| Washington DC 20005-5793
(202) 879-5081 **DIRECT** | (202) 879-5200 **FAX** | (301) 785-8369 **CELL** |
bharding@kirkland.com

"Alan Rich"
[<arich@baronbudd.com>](mailto:arich@baronbudd.com) To <ABasta@kirkland.com>
02/14/2007 11:48 AM cc <bharding@kirkland.com>, <eahern@kirkland.com>, <jbaer@kirkland.com>,
Subj Re: W.R. Grace-- Celotex Subpoena
ect.

Thank you. Please note, however, that by my calculations, the objections are due Friday (CRMC) and Monday (Celotex), therefore, I really need to know either way by the end of the day today, unless you are also willing to agree (by the end of today) to extensions of the objection dates.

Alan Rich

-----Original Message-----

From: Amanda Basta <ABasta@kirkland.com>
To: Alan Rich <arich@baronbudd.com>
CC: Barbara Harding <bharding@kirkland.com>; Ellen Ahern <eahern@kirkland.com>; Janet Baer <jbaer@kirkland.com>; Jodye Marvin (E-mail) <JMarvin@claimsres.com>; Lisa Esayian <lesayian@kirkland.com>; Nate Finch (E-mail) <ndf@capdale.com>
Sent: Wed Feb 14 10:42:23 2007
Subject: RE: W.R. Grace-- Celotex Subpoena

Mr. Rich--

In furtherance of meet and confer efforts, we will attempt to determine if there is a way to limit Request Number 1 to Grace Claimants that does not cause undue delay, burden on the subpoena recipient, or other

technical issues. We hope we can resolve this amicably without necessitating motions practice, and we will get back to you once we can make that determination.

Regards,

Amanda

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"Alan Rich" <arich@baronbudd.com>

02/13/2007 05:51 PM

To

"Amanda Basta" <ABasta@kirkland.com>

cc

"Barbara Harding" <bharding@kirkland.com>, "Ellen Ahern" <eahern@kirkland.com>, "Janet Baer" <jbaer@kirkland.com>, "Lisa Esayian" <lesayian@kirkland.com>, "Nate Finch \E-mail\>" <ndf@capdale.com (Email)>, "Jodye Marvin \E-mail\>" <JMarvin@claimsres.com>

Subject

RE: W.R. Grace-- Celotex Subpoena

Barbara -- I take it that this is the answer you said would be forthcoming(?)

If so, please consider this my attempt to meet and confer with you prior to filing objections to the scope of request No. 1 to the subpoenas. We believe that the requests are improper and invade the rights of our clients who are not also "Claimants." If you intend to proceed by seeking all documents regarding anyone who has made a claim against those trusts, even if those persons are not Claimants in the Grace bankruptcy, we will file motions to quash.

Please let me know at your earliest convenience whether you will agree to modify your subpoenas.

Regards,

Alan Rich

-----Original Message-----

From: Amanda Basta [<mailto:ABasta@kirkland.com>]
Sent: Tuesday, February 13, 2007 4:34 PM
To: Alan Rich
Cc: Barbara Harding; Ellen Ahern; Janet Baer; Lisa Esayian
Subject: RE: W.R. Grace-- Celotex Subpoena

Mr. Rich--

The subpoena seeks information regarding each person who has filed a claim with the Celotex Trust (as does the subpoena served on CRMC).

Regards,

Amanda

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"Alan Rich" <arich@baronbudd.com>

02/13/2007 04:23 PM

To

"Amanda Basta" <ABasta@kirkland.com>

cc

"Janet Baer" <jbaer@kirkland.com>, "Lisa Esayan" <lesayan@kirkland.com>, "Ellen Ahern" <eahern@kirkland.com>, "Barbara Harding" <bharding@kirkland.com>

Subject

RE: W.R. Grace-- Celotex Subpoena

Thanks for the subpoena. I have the same question about this subpoena as I did about the CRMC subpoena (although no answer has yet been received):

With regard to the Celotex subpoena, can you clarify whether document request no. 1 seeks information on "each person" who has filed a claim with the Celotex Trust (as stated in the opening part of that request), or is that request limit to information about "Claimants" (as defined in the definitions section) by virtue of subparagraph (b) of that request?

Please respond at your earliest convenience, as your response is important to whether we file an objection.

Regards,

Alan Rich

---Original Message---

From: Amanda Basta [<mailto:ABasta@kirkland.com>]

Sent: Monday, February 12, 2007 5:34 PM

To: Alan Rich

Cc: Janet Baer; Lisa Esayan; Ellen Ahern; Barbara Harding

Subject: W.R. Grace-- Celotex Subpoena

Mr. Rich--

Jan Baer forwarded me your request for a copy of the subpoena that Grace served on the Celotex Trust. I attach the same. Please let us know if you have any further questions.

Regards,

Amanda

Amanda Basta

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